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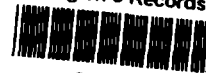
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October 7, 2005

Mr. Tom Turner
Associate Regional Counsel
U.S. EPA - Region 5
Office of Regional Counsel (C-14J)
77 W. Jackson Boulevard
Chicago, Illinois 60604

EPA Region 5 Records Ctr.



285029

Re: RRG/Clayton Chemical Site

Dear Mr. Turner:

This letter responds to your September 27, 2005 General Notice of Potential Liability correspondence addressed to Carboline.

Carboline has not been presented with any information establishing a nexus to the above-referenced site nor has it received any information in support of "the volumetric ranking" referenced in your September 27 letter. We have requested any relevant information from the "initial group of PRPs" (referenced in your letter), although we may not agree to the condition(s) imposed by them to release the information. We otherwise would be happy to review and evaluate any nexus information that they or you may have. In the meantime, Carboline denies any allegation made by the PRP Group, their Investigation Report (referenced in your letter), or in the claimed PRP information and volumetric ranking as it relates to Carboline's alleged liability for conditions at the RRG Site.

Our internal investigation has not revealed any nexus to the site. As such, we believe that Carboline was incorrectly identified as a PRP. If you have any information linking Carboline to the site, please forward it to my attention.

If you have any questions, please contact me.

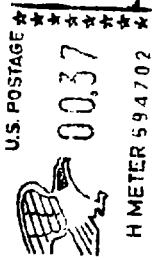
Very truly yours,

Thomas R. O'Donnell

cc: Sharon R. Newlon, Esq.

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